

Hon. Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID MYRLAND,

Defendant.

No. CR 11 – 057 RSM

DEFENDANT’S MOTION TO CONTINUE
PRETRIAL MOTIONS DEADLINE

Note for Motion: Friday, March 25, 2011

1. Relief Requested

DEFENDANT DAVID MYRLAND moves the court for an order continuing the pretrial motions deadline to Friday, March 25, 2011.

2. Grounds

On February 14, 2011, Mr. Myrland was arraigned on the charge of interstate transmission of a threatening communication. At arraignment, the trial date was scheduled for April 25, 2011, and the pretrial motions deadline was set for March 17, 2011. I appeared at the

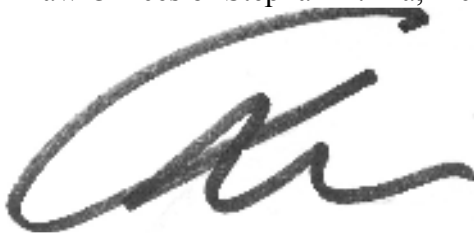
1 arraignment on behalf of Mr. Myrland, pursuant to my appointment to represent him in this
2 action.

3 On March 10, 2010, I received over 1,200 pages of discovery materials from the
4 government. The materials include police reports, witness statements, photographs, civil
5 litigation pleadings and materials, search warrant materials, transcripts of phone messages, and
6 emails related to the charge in this case.

7 A short continuance of the motions deadline is necessary to allow defense counsel time to
8 complete a factual investigation of the case and prepare necessary pretrial motions. Despite the
9 exercise of due diligence, I have been unable to review the discovery provided by the
10 government, complete the defense investigation and prepare pretrial motions.

11 Respectfully submitted on March 16, 2011.

12 Law Offices of Stephan R. Illa, Inc., P.S.

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15 Stephan R. Illa
16 WSBA No. 15793
17 Attorney for Defendant

18 Certificate of Service

19 I certify, under penalty of perjury under the laws of the State of Washington, that today I
20 electronically filed this pleading and all attachments with the Clerk of Court using the CM/ECF
21 system, which will send electronic notification of the filing to the attorneys of record for each of the
22 parties.

23 Signed on March 16, 2011 in Seattle, Washington.

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Stephan R. Illa